

Parametrix, Inc.

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March 19, 2002
PMX# 216-1598-012 (04/01A)

Mr. Calvin J. Terada
Environmental Protection Specialist
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue (OW-137)
Seattle, WA 98101

Re: Rule Authorization of The Tulalip Tribes' Wastewater Infiltration System

Dear Mr. Terada:

The purpose of this letter is to confirm your verbal response to our February 20, 2002, submittal to you for rule authorization for rapid infiltration of effluent from the proposed membrane treatment system at The Tulalip Tribes Business Park. This letter also provides a draft outline (enclosed) for our proposed submittal for rule authorization.

Our understanding based on our telephone conversation on March 3, 2002, is that the EPA concurs that the treated effluent infiltration system with flows of up to 250,000 gallons per day proposed by The Tulalip Tribes is, in principle, suitable for rule authorization under the EPA's Underground Injection Control Program. As we have discussed, The Tribes expect that the infiltration portion of the system will operate for approximately three years until an NPDES authorized discharge to surface water can be obtained.

The procedure for obtaining rule authorization is to submit to the EPA a request for rule authorization that provides appropriate information as described in the Underground Injection Control Program regulations and as further requested by you. Based on our understanding of these requirements, we have prepared a draft outline for the submittal. Following your receipt of The Tribes' submittal, the EPA will make a determination for rule authorization within 30 days.

Please respond to me by April 3, 2002, if any of the above is inaccurate or otherwise not consistent with your understanding of the EPA requirements, and if you have any comments and/or suggestions regarding the enclosed outline. The Tribes desire to make its submittal as complete as possible in order to fully meet the EPA requirements for rule authorization.

Thank you for your assistance with this matter. Please call me if you have any questions.

Sincerely,

PARAMETRIX, INC.



Kenneth T. Fellows, P.E.
Project Engineer

KTF:jk

Enclosure

cc: Tom McKinsey, The Tulalip Tribes
Mike Ollivant, Parametrix/Sumner



DRAFT OUTLINE
Application for Rule Authorization of
The Tulalip Tribes' Wastewater Infiltration System

1. INTRODUCTION

2. OWNER/BASIC DATA

- A. Facility name, ownership, mailing address and telephone number
- B. Tribal status
- C. SIC codes
- D. Type of injection well
- E. Operating status (new)
- F. Related permits (Listing of all permits received or applied for: RCRA, UIC, NPDES, Clean Air Act, Ocean dumping, Dredge and Fill under Clean Water Act, other environmental permit)

3. PROJECT/SITE CONDITIONS

- A. Overview of regional land use and site conditions (Including topographic map of regional area showing relevant site features, reservation boundaries, water bodies)
- B. Drinking water wells within 1/4-mile radius of infiltration basins

4. DESCRIPTION OF FACILITIES

- A. Summary:
 - 1. Summary of development, wastewater flows, sewage disposal, etc.
 - 2. Existing
 - 3. Future (Proposed)
- B. Description of business park/inflows/industrial control and pretreatment regulation
- C. Description of Kubota Treatment System:
 - 1. Location/site plan
 - 2. Overview (reference to technical info in appendices)
 - 3. Design criteria/layout/controls

4. Observed/predicted effluent quality (Including comparison to drinking water standards)

5. Sludge disposal

D. Description of Effluent Infiltration:

1. Location/site plan (Including basin location summary table) (Township, range, section, or lat-long)

2. Overview (Reference to technical info in appendices)

3. Site conditions (Soils, groundwater, infiltration rates, etc.)

4. Design criteria (Average and max infiltration rates, groundwater mounding, etc.)

5. Construction narrative, schematic plans and cross-sections

5. MONITORING PROGRAM

A. Sampling and Analysis Plan:

1. Effluent monitoring location, parameters, test methods, and frequencies

2. Groundwater level monitoring locations and frequencies

B. Routine reporting

C. Emergency reporting

D. Recordkeeping

6. PLUGGING AND ABANDONMENT PLAN

A. Description

B. Cost

7. SCHEDULE

A. Startup

B. Operational life

C. Close-out

8. CONTINGENCY PLAN

- A. Effluent quality
- B. Effluent quantity (relative to infiltration capacity)
- C. No NPDES Discharge Permit

9. CERTIFICATION BY RESPONSIBLE OFFICIAL (See regulation for exact text)

10. APPENDICES

- A. Wastewater flow predictions
- B. Tribal industrial control/pretreatment regulations
- C. KUBOTA plans and literature
- D. Water quality data
- E. Effluent Infiltration Plans and Analyses:
 - 1. Infiltration test summary
 - 2. Soils investigations (AMEC reports)
 - 3. GW investigations and mounding analysis (PGG)